

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HINDS COUNTY, et al.,

Defendants.

CIVIL NO.: 3:16-CV-00489-CWR-RHWR

**UNITED STATES' EXPERT DISCLOSURES**

Pursuant to the Court's Order of February 3, 2022, the United States provides the following information:

1. Persons retained or specially employed to provide expert testimony. The United States has not retained or specially employed an expert to testify at the upcoming evidentiary hearing.
2. Other experts who may provide testimony under Federal Rules of Evidence 702, 703, 704. The United States may call non-retained experts to provide testimony at the evidentiary hearing. Their names, subject matter, and summary of their opinions are provided below. The first four of these experts are the Monitor and the three members of her team. They are court-appointed officers of the Court, but Defendants pay for their services. Their credentials have previously been disclosed to Defendants, who agreed to their appointment. Nonetheless, the United States provides copies of their curricula vitae with this production and disclosure. The fifth witness is Ms. Bryan, the former Jail Administrator. The United States also provides a copy of Ms. Bryan's curriculum vitae.

**EXHIBIT**

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- a. Elizabeth Simpson – Ms. Simpson is the Court Monitor. She is an attorney by training, and her subject matter expertise includes prisoner re-entry and discharge, detainee complaint and grievance procedures, criminal justice coordination programs, and community corrections. She will testify about facts and opinions previously disclosed in her fifteen monitoring reports and an interim report (“monitoring reports”). She will testify about her ongoing monitoring activities, both as an expert and her personal factual observations. She will testify about her monitoring duties; team member roles; the monitoring process; her historical observations and interactions with Defendants. She will testify on subjects detailed or summarized in the monitoring reports, including Defendants’ compliance with the court’s orders; policy and procedure development; leadership and staff turnover; Defendants’ lack of planning and progress in coming into compliance with court orders; unlawful detention; Jail grievance, investigation, and incident reporting systems; the Criminal Justice Coordinating Committee (CJCC); and development of pretrial programs and other CJCC-related remedies.
- b. David Parrish – Mr. Parrish is a former jail commander, jail manager, security auditor, and corrections consultant. He is the Monitor’s subject matter expert for corrections, penology, detainee security, jail safety, and jail management and administration. He will testify about facts and opinions previously disclosed in the monitoring reports. He will testify about his ongoing monitoring activities, both as an expert and his personal factual observations. He will testify about his monitoring role and duties, the monitoring process; and his historical observations and interactions with Defendants. He will testify on subjects detailed or

summarized in the monitoring reports, including Defendants' compliance with the court's orders; protection from harm; use of force; incident reports; investigations; segregation; and grievances. *Cf.* Consent Decree, ECF 8-1, Sec. A-J. To the extent staffing, training, and security procedures for staff at the adult facilities affect conditions in the Henley-Young Youth Detention Center, or medical and mental health programs for detainees, he will also address those issues. He will specifically address supervision; staffing; training; booking and discharge; classification; detainee supervision (including direct supervision and supervision of high risk detainees and specialized housing units), training and management of jail staff; leadership and staff turnover; physical plant, including locks, doors, alarms, and fire safety; maintenance systems; emergency response; use of force reporting, investigation, and response; incident reporting, investigation, and response; recreation and detainee activities; Defendants' lack of planning and progress in coming into compliance with court orders; and policies and procedures.

- c. Dr. Richard Dudley – Dr. Richard Dudley is a physician and psychiatrist. He is the Monitor's subject matter expert for jail mental health, psychiatry/medicine, discharge planning, hospital and non-correctional mental health treatment options. He will testify about facts and opinions previously disclosed in the monitoring reports. He will testify about his ongoing monitoring activities, both as an expert and his personal factual observations. He will testify about his monitoring role and duties; the monitoring process; and his historical observations and interactions with Defendants. He will testify on subjects detailed or summarized

in the Monitoring reports, including Defendants' compliance with the court's orders and mental health and medical-related sub-sections of the Consent Decree's substantive sections. *Cf.* Consent Decree, ECF 8-1, Sec. IV.A-N. These include the mental health, suicide, and medical-related provisions of the protection from harm, use of force, and segregation sections of the Consent Decree. *Cf.* Consent Decree, ECF 8-1, Sec. IV.A-E, J. He will also address how prisoners with serious mental health issues are affected by use of force, incident reporting, investigations, and quality assurance programs. He will be specifically addressing mental health and medical policies and procedures; mental health and medical staffing; assessment, diagnosis, and treatment of persons with serious mental health and medical conditions; medical records; discharge planning; and Defendants' lack of planning and process for coming into compliance with court orders.

- d. Jim Moeser. Mr. Moeser is a former juvenile corrections administrator, former juvenile court administrator, community juvenile program manager, and juvenile justice consultant. He is the Monitor's subject matter expert for juvenile justice and administration. He will testify about facts and opinions previously disclosed in the monitoring reports. He will testify about his ongoing monitoring activities, both as an expert and his personal factual observations. He will testify about his monitoring duties; team member roles; the monitoring process; and his historical observations and interactions with Defendants. He will testify on subjects detailed or summarized in the Monitoring reports regarding Defendants' compliance with the court's orders regarding youthful prisoners, and segregation. *Cf.* Consent

Decree, ECF 8-1, Sec. IV.K. To the extent youthful prisoner issues are sub-provisions of other categories (e.g., protection from harm, unlawful detention, and the CJCC sections), he may also testify on those issues. He will specifically address conditions in the Henley-Young Juvenile Justice Center; staffing, security, violence, and supervision at Henley-Young; juvenile housing; leadership and administration of Henley-Young; facility operations; Defendants' lack of planning and progress in coming into compliance with court orders; and development and delivery of youth programs, education, activities, and services.

- e. Kathryn Bryan – Ms. Bryan is the former jail administrator for the Hinds County Detention Center. She will testify about facts and opinions developed in the course of her work at the Jail and her personal observations. She will testify about the Defendants' compliance efforts, barriers to reform, planning, and leadership. She may testify about conditions in the Jail; staffing and supervision; Jail security; staff training; leadership and operations of the Sheriff's Department; physical plant, maintenance, and fire safety; use of force, incident reporting, and investigations; and policy development and implementation.

Respectfully Submitted,

**FOR THE UNITED STATES:**

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